

7-1-84

DECLARATION OF GERALD ARMSTRONG

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2 1. I am making this declaration to bring to the Court's
3 attention activities in which L. Ron Hubbard, Mary Sue Hubbard
4 and/or Scientology, hereafter referred to as LRH, MSH and
5 Scientology respectively, are presently engaged relevant to the
6 "Temporary Stay Order" granted by the Court and annexed hereto as
7 Attachment A. It is hoped that this declaration will assist the
8 Court in evaluating what is the actual intention of MSH and
9 Scientology in seeking such a stay and the perverted use to which
10 any order by the Court may be put.

11 2. The following narrative describes recent actions taken
12 against my wife and me by LRH, MSH and/or Scientology. I remain
13 convinced that these parties seek my destruction and are trying
14 to frame me and drive me insane.

15 3. On June 21, 1984 I flew with my wife to London,
16 England. The purpose of my trip was to testify in the English
17 Court in a case involving the custody of two children. The
18 solicitor who had originally requested me to testify and with
19 whom I dealt while in London is Arthur Weir, Esq. of the firm of
20 Tweedie and Prideaux.

21 4. A friend of mine had telephoned me prior to my going to
22 London and informed me that Scientology knew of my trip and that
23 the organization was planning an operation against me to occur
24 while my wife and I were in London. Prior to our trip I alerted
25 Mr. Weir and Julia Dragojevic, my attorney in the instant case,
26 of this possible intelligence action. My wife and I decided to
27 still go to London because we felt that not going would only
28 allow Scientology to continue to control our lives by threat and

1 intimidation.

2 5. I testified in the custody case on June 25 and on
3 Tuesday, June 26, two incidents occurred which indicated to my
4 wife and me that an operation of some sort was being carried out
5 against us. At approximately 10:00 a.m. the receptionist of the
6 hotel in which we were staying asked me to take a telephone call
7 in reception. We were staying on the fifth floor and had no
8 telephone in our room. I walked down to the first floor to take
9 the call. The caller, a woman, simply confirmed that I was Gerry
10 Armstrong and then hung up. I waited about fifteen minutes for a
11 call back which didn't come. I knew then that Scientology
12 operatives had discovered and confirmed where my wife and I were
13 staying in London. Later in the day we spotted a man on top of
14 a building across the street from our hotel watching our room. I
15 knew then that we were being surveilled but did not determine the
16 purpose of the surveillance until the day of our departure from
17 London.

18 6. I alerted Mr. Weir to the phone call and the
19 surveillance but there was nothing else to be done at that time.
20 The biggest effect caused was to make my wife's and my stay in
21 London worrisome and tense when it could have been pleasant.

22 7. On June 29 when my wife and I were checking in at
23 London's Heathrow airport for our return flight to the U.S., we
24 were accosted by three men, one of whom called my name and thrust
25 at me the Temporary Stay Order, Attachment A. It was then 11:20
26 a.m. Our plane was due to depart at 11:55 and was already
27 boarding. There was no actual reason for the Temporary Stay
28 Order to be served on me at the airport in London since it has

1 for some time been the arrangement for any service of pleadings
2 etc. to be made on my attorney of record in my stead. The only
3 purpose of such service at that time and the harassment that
4 followed would be an effort to make us miss our flight back to
5 the U.S.

6 8. The man who did all the talking of the threesome was in
7 his 40's about 5'10", very overweight and with an offensive odor.
8 He identified himself as John Ingram, a private investigator.
9 One of the other men was grey haired, probably in his 50's also
10 around 5'10" and more distinguished looking than Ingram. The
11 third man was probably in his early 20's, about 5'5" wearing a
12 motorcycle jacket and carrying a helmet. My wife identified him
13 as having followed us all the way from downtown London in the
14 train to the airport. These two men would not give their names,
15 but admitted that they worked for Ingram.

16 9. I had heard about Ingram on the previous Saturday from
17 a former Scientologist, Jon Atack. Mr. Atack had told me that
18 Ingram was retained by Scientology in the U.K. and had been
19 involved in harassment of people who had split off from the
20 organization. Ingram is not the same person as Eugene Ingram or
21 Ingraham, another private investigator employed by Scientology in
22 the U.S. to carry out their covert operations and harass
23 individuals.

24 10. At Heathrow airport, Ingram was abusive and pushy. He
25 and his cohorts followed my wife and I through the airport as we
26 went through the check-in procedure. Ingram kept questioning me
27 and accusing me about being in contempt of court and about an
28 alleged meeting on Tuesday evening, June 26 at the Olde Cock

1 Tavern in London. Ingram's statements ran as follows:

2 "Who did you meet at the Olde Cock Tavern on Tuesday
3 evening?"

4 "Who was the man you met at the Olde Cock Tavern?"

5 "You're in contempt of court."

6 "Who did you give the sealed documents to?"

7 "You violated the court order."

8 "You were seen giving the sealed documents to a bearded
9 man on Tuesday evening in the Olde Cock Tavern."

10 "Who was the person you gave the sealed documents to?"

11 "Two private investigators observed you on Tuesday
12 evening in the Olde Cock Tavern giving the sealed
13 documents to a bearded man, an Arab. You're in
14 violation of this court order. You're in contempt of
15 court."

16 11. I told Ingram that he was (variously) mad, working for
17 terrorists, a liar, harassive, trying to frame me, and full of
18 fecal matter.

19 12. There is absolutely no truth to Ingram's statements or
20 accusations. I had no sealed documents in London, nor any way to
21 obtain sealed documents. I had met no Arab in London. I had
22 given no one any documents while in London except a copy of Judge
23 Breckenridge's intended Judgment and this to no bearded man; no
24 Arab and nobody in the Olde Cock Tavern.

25 13. I had been in the Olde Cock Tavern restaurant on
26 Monday, June 25 for lunch with my wife. This establishment is on
27 Fleet Street, right across from the English Court where I was
28 then testifying. When the Court broke for lunch my wife and I by

1 chance ate at the Olde Cock Tavern. We ate alone and did not
2 pass documents to anyone. On Tuesday evening, June 26, my wife
3 and I, because we had had a good meal there the day before and
4 because it is near the hotel where we were staying, decided to
5 have dinner at the Olde Cock Tavern. Upon arriving in front of
6 the establishment, however, we found a sign stating that the
7 restaurant was closed except for a private party which had
8 reserved it for the evening. We therefore did not enter the Olde
9 Cock Tavern on Tuesday evening.

10 14. At a minimum the actions of these private investigators
11 hired by LRH, MSH or Scientology are harassive and designed to
12 intimidate my wife and me. More likely these actions are part of
13 a larger plan to entrap or frame me and so bring about my
14 destruction which these people seek. Entrapment and frame-ups
15 are standard Scientology intelligence actions. Allegations of
16 contempt of court are designed to break me financially by forcing
17 me to defend myself legally. The actions of LRH, MSH and/or
18 Scientology keep me convinced that I have no future after
19 Scientology and that my life and my wife's life are just as much
20 in danger now that the case has been won as before the litigation
21 began. LRH, MSH and Scientology are vindictive and will stop at
22 nothing to get revenge.

23 I declare under penalty of perjury that the foregoing is
24 true and correct.

25 Executed this 1st day of July, 1984 at Costa Mesa,
26 California.

27 
28 GERALD D. ARMSTRONG

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT
DIVISION THREE

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, and
MARY SUE HUBBARD,

Petitioner,

v.

THE SUPERIOR COURT OF THE
STATE OF CALIFORNIA, FOR
THE COUNTY OF LOS ANGELES,

Respondent.

GERALD ARMSTRONG,

Real Party in
Interest.

No. B 005912

(Super. Ct. No. C 420153)

LOCKE BR...
JUN 22 1984
C. J. ROBBINS, JR.
Deputy Clerk

TEMPORARY STAY ORDER

THE COURT:

In order that this court may have the opportunity to fully consider the "Emergency Application for Stay Pending Appeal", filed June 22, 1984, and the supplement thereto, filed June 25, 1984, it is hereby ordered that the exhibits received in evidence and

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marked for identification in Los Angeles Superior Court Case No. C 420153, entitled Church of Scientology of California, et al. v. Gerald Armstrong, shall not be made available for public inspection pending resolution of this application for relief. The "inventory list and description of materials" presented to the court by the attorneys for Gerald Armstrong also shall not be made available to the public at this time.

Opposition to this "application" is to be filed on or before July 2, 1984.

CLAY ROBERTS, Jr. Clerk of the Court of
 Appeals, District State of
 California
 JUDICIAL DISTRICT OF LOS ANGELES
 CLAY ROBERTS, JR. Clerk
 By _____ Deputy Clerk
 STATE OF CALIFORNIA
 JUL 2 1984